

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LOUIS G. RASETTA and JOHN J. SHAUGHNESSY,
as they are TRUSTEES, INTERNATIONAL UNION
OF OPERATING ENGINEERS LOCAL 4 HEALTH
AND WELFARE, PENSION AND ANNUITY FUNDS,
and LOUIS G. RASETTA and CHRISTOPHER
BARLETTA, as they are TRUSTEES, HOISTING AND
PORTABLE ENGINEERS LOCAL 4 APPRENTICE
AND TRAINING FUNDS and INTERNATIONAL
UNION OF OPERATING ENGINEERS, LOCAL 4,
Plaintiffs

vs.

PENNEY CONSTRUCTION CORP.,
Defendant

and

T.R. WHITE CO., INC.,
Reach-and-Apply Defendant

and

SOVEREIGN BANK,
Trustee

C.A. No. 04-12463 MLW

NOTICE OF WITHDRAWAL AS COUNSEL

In accordance with Local Rule 83.5.2(c), Anne R. Sills hereby gives notice of her
withdrawal as counsel in the above-captioned matter.

Respectfully submitted,

LOUIS G. RASETTA and JOHN J.
SHAUGHNESSY, as they are TRUSTEES,
INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL 4
HEALTH AND WELFARE FUND, et al,

By their attorneys,

/s/ Anne R. Sills
Anne R. Sills, Esquire
BBO # 546576
Segal, Roitman & Coleman
11 Beacon Street
Suite #500
Boston, MA 02108
(617) 742-0208

Dated: March 22, 2005

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Notice of Withdrawal as Counsel has been served by first class mail upon Plaintiffs Louis G. Rasetta and John J. Shaughnessy, as they are Trustees, et al by service upon counsel of record Randall E. Nash at 166 Schoosett Street, Suite #2B, (Route #139), Pembroke, MA 02359 and upon the Defendant Penney Construction Corp., at their last-known address, 85 Charles Street, Bridgewater, MA 02324, and upon Reach-and-Apply Defendant T.R. White Co., Inc. at 368 Congress Street, Boston, MA 02210 this 22nd day of March, 2005.

/s/ Anne R. Sills
Anne R. Sills, Esquire